

In the United States District Court
Eastern District of Arkansas
Western District of Arkansas

4:19-CV-114

Charles Ashen

VS.

Rock Region metro

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

APR 24 2019

JAMES W. McDORMACK, CLERK

By:  DEP. CLERK

objections to Defendants motion to dismiss

comes now Plaintiff (Charles Ashen) By and
Through his attorney (Pro SE). Pursuant
to Federal Rules, Civil Procedure.

Defendants motion is nothing more
than a smoke screen, to cover up their
conspiracy. Plaintiff can prove conspiracy
between all Defendants, and prove that they
violated each and every claim.

(2019)

1.

on Jan 31st Plaintiff notified Rock
Region that Civil Rights Investigator
(Drew Malone) would submit my Request
(F.O.I.A.) This document is already ready
in exhibit.

2nd

2nd after we left I was taken to (L. R. P. D.) to retrieve a copy of a police Report that is already on Exhibit. In that Report it is clearly stated that the (L. R. P. D.) can not make Rock Region Metcop send me a notice of Charges.

Let the Court Review this damning Evidence, and ask why was I told on the Phone by (Charles Jackson) I was suspended.

3rd

Plaintiff Received the Letter 30 days after it was writtem, I had to call the police just to get it on Record. as I was on the phone (L. R. P. D.) and Jackson had a conversation out of Ear shot.

4th

The Little Rock P.D. internal affairs say they dont have anything to do with Rock Region, but they said they will arrest me w/ or without Notice of Charges.

5th

the little Rock police should have told them the Law Requires a notice of Charges. That law is clearly Established.

When I called Judge Humphrey he said dont get on the bus, so now plaintiff know they gonna give me a 30 day suspension and have me arrested when I get there.

3

6. Defendant Jackson kept telling me catch the bus down town to get a suspension letter this proves how they insult my intelligence.
why did he not put it in the mail?
answer, to entrap plaintiff.
7. Donna Bowers suspended me for 60 days for calling, harassing phone calls. as they put it, Cause I kept demanding the name of ~~def~~ a bus driver who slammed my hand in the door with intent to drag me down town that constitute a 8th amended Violation. This is part of what is on appeal in CASE 18-3588 8th Cir.
8. Defendants knew this Cause Plaintiff can be seen on camera putting a coin on Rock Region Metro Company Vehicle. Defendant Vaughan Retrieved it. Plaintiff Joe Left voice mail on Defendant voice mail, asking quote does that Firm intend on representing Defendants on both Cases before Defendants were even served in 4:19-CV-114
9. If the court will look at defendants Correa Suspension Letter where he alleged I mention Events of Columbine
CONT.

4th

10. I surly did, imfact, 4-19-20 marks the 20th year it happen. I said that's why them kids are doing it. they go all out the way to parents, teachers, prispals ETC. and no one listens, what they will do is to make monkey of those kids. and I feel like they do, but I dont condere, I wish they could have come to me, I would have step up Bully Seared Straight.

11. oscar suspended me 30 days for 1st amendment Right on appeal 8th Cir. it started 4-18-CV-751 now on appeal. SEE exhibit ON appeal ~~why~~ it tells you suspended on 15th of June 18 Effective 15th-18 and I was kam off the lat by police the day these letters were typed up.

12. the jam31st letter started 1-3-19. like all the others it Expired 3-2-19 all that extra jargem the defendants put in is without merit.

If they plan on Changing the way they suspend me then where are the new Rules? does not the Law Require all Rules Exacto Rules be posted - ?

5th

- 13th on march 2nd 2019 why does plaint present a copy of a ~~transfer~~ day pass, when Floyd Bibbs let plaintiff on the bus. plaintiff has submitted to the United States District Court a copy of a transfer dated 1-31-19. Why did not plaintiff receive that same letter on 1-31-19
- 14 Plaintiff submitted copies of a day pass dated 2-1-19 the exact date Plaintiff Civil Rights investigator left Rock Region Metro. oh! yes it, the letter in question is of Cause (Effective) 2-1-19 Mr. Malone dropped me off at Guyersprings & Base Line I got on Bus 23rd trainee at the wheel.
15. It was then Defendant Vaughn, came out the office looked around and made sure Mr. Malone was not present. Said someone wanted to see me. Right then I knew I was on suspension (Defendants admit their own guilt) Look at the top of all suspension letters make defendants send copies of all suspension letter to Rm 1-29 A let Every Judge have a copy

6th

16 in all the Bodies of the Suspension Letters Say Effective day its written.

the last suspension was typed and signed so fast they don't even put a address, why? Cause they put them in my hand, and Run me off the lot. Court has authority to get the tapes.

17. Police Report written by mafia cop collins walton says I called Rock Region and said I was gonna ride

3-2-19 the bus. I did, I said sat on Sunday now lets talk about the voice

OR 3-3-19 mail I left on defendants Jackson voice mail. on 1-31-19

I stated I was gonna send Mr. Malone 1-31-19 but something came up

so we decided 2-1-19 at 9: had battery trouble but did not arrive until about 10:45 not look at the time of my

Day pass on Exhibit to the time I came, day they wrote it 1-31-19, day it was served. soon as Malone left.

Defendants attorney was left voice mails of these people actions at least a year before I sued he should have warned them. Conspiracy, Just like I said.

18. Even in the (A.D.C.) Arkansas Department of Corrections if a inmate is given a infraction, written notice of charges, before his privileges can be taken. He or she must have a (hearing), a right to call witness, and a right to appeal.
19. 6- Suspensions and here I am a black man, in society in what is known as the Free world, and I don't get a fair, and impartial hearing. and these people won't even respond to the complaints of the passengers the whole damned board of Directors are liable.
20. the police (allison walker) at the ~~alter~~ altered the police Report to help rock region. All of Rock Region employees let me on the bus. 3 bus drivers not a word. B the police doesn't even say supervisor told her this. but internal affairs say they don't have anything to do with this. the police Report says Bibbs shrug his shoulder after I took a Fighting Stance. I did, he got out his seat, got off the bus, and ran to driver side like he was gonna hit me.

25th 8th h

21. If a inmate in the A.D.C. took their privileges for over 60 days they are allowed a 48 hr Relief. Took at my 60 day suspensions, is there Record of a 48 hr. Relief. No

22 on suspension 60 days for threats threatening, 1- for harassing calls for 60 days see how they give you what they want. if you complain they suspension.

23. Every letter comes behind a letter to the Governor why is plaintiff writing the governor about my complaints. Cause the whole (Board of Directors) is in on it, why won't they let me speak to anybody. Cause they say Everybody has orders to Refer me to (Charles Jackson) This

means Charles Fraizer, Wilson Vaughn, Donna Barbers, and Charles Jackson.

my advise is to save the Court time, if they Fight it

I want a Jury Trial I bet they can Rock a bust before

9

24. Defendants know if I had just one school year at any universe I would literally cite laws from the frailest cottage to the strongest kingdom.

the only reason they want give indefinite ~~no year~~ suspension is because the Fed. Trans. adm. Civil Rights division said they cant. Charles Jackson threaten me with a indefinite suspension.

now what the Cam Rock Region tell to do that.

Look at that Police Report 10-31-16
no suspension no jail.

25 Please be advised that plaintiff has a
Trial date 5-9-19 please contact
municipal, and have them contact

U.S.D.C. of my disposition if plaintiff
Requires jail time 5-9-19

please forward all mail to P.C.J.D.C.

Roosevelt Rd.

40

1. Plaintiff suspensions for any amount of time constitute a violation, and it has been going on for a while.
 Plaintiff suspensions, violates plaintiff Freedom of Speech, and are not in violation of Law. It is my constitutional Right to speak freely.

mattox v. U.S. 156 US 237, 243

2. Each time I was Run off The Lat I was not always suspended Wilson Vaughn, Charles Jackson, have had Little Rock Police to Run me off the lat, and just like that I was threaten to be jailed, if I don't move he said he would use force.
 Defendants converted my Rights into crimes

3. It is said that the board of directors make the Rules but did not intervene, who Charles Frasier, Demore Bowers, Wilson Vaughn, and Charles Jackson were violating administrative directive Rules, and Regulation, and Employee Conduct manual.

Williamson vs. U.S. Department of Agriculture
 815 F.2d 369, ACLU Foundation v Barr,
 952 F.2d. 457 299 US. APP. DC. 101 (CA DC) (1991)

CONT.

11

4. # Plaintiff has stated his Claim as best he can without the advice of a lawyer, I don't have a computer, and plaintiff's time is mostly consumed by a (87) year old.

when I get the bus its my mental Repentment am in care here from 12-18-22 has a day however I have a right to leave.

Paris v. Weechler, 263 U.S. 22, 24
Stromberg v. California, 283 U.S. 359.
NAACP v. Alabama 375 U.S. 449

The assertion of Federal rights, when plainly and reasonably made are, not to be defeated under the name of Local Practice.

5. # Defendants know, attorney for the defendant knows that ignorance of the Law is no Excuse, a Court has ruled that Plaintiffs in many cases have plausible claims, they keep alleging that Every thing I write makes no sense.

and I will recite, and continue to recite *Haines v. Kerner*, 404, U.S. 519 (1972)

Jenkins v. McKeithen 395 U.S. 411, 421 (1959)

Puckett v. Cox 456, 2nd 233

Pickens v. Pennsylvania Railway 151 F.2d 240, Third Circuit.

CONT.

12

6 # Rock Region metro employees have audio visual on the bus but every time I file a complaint Rock Region will not respond nor will it investigate its own agency, I got the F.B.I. civil rights division as well as (2) agents whom can look any judge in the eye and verify that plaintiff story checks out, and if they question Defendants about any allegations they will lie and get caught up on obstruction of Governmental operation.

I went to army, and everybody for help, 2 1/2 years of this harassment, stigmatizing, adulating, social media slander (provoking for 2 years) and a half each time I wrote Governor they got me the same frame between letters, + suspension letters Prove it, Cant call the governor, It does not break the law, And the F.B.I they know I am not lying.

Defendants were advised the F.B.I took photos of the Cant orders, and they said they would need go to Rock Region next.

CONT.

#13

17. Defendant Bauer Retaliated Charles
Franger knew it, Charles Jackson
is operation manager he knew Vander
would issue the suspension
letter, they all played a part.
I filed a complaint they
Retaliated

Miranda v. Arizona
384, U.S. 436, 491.

Defendants Dog simply
went hunt.

- #
18 (Miller v. U.S. 230 F. 486, 489)

19. as stated in Sherer v. Cullen, 481 F. 946
we go on quoting Court decisions,
after court decisions
The Constitution answers
all questions.?

Miranda v. Arizona 384 U.S. 426,
491, 86 S.Ct. 1603.

- #
20 Sherer v. Cullen 481 F.2d 946 (1973)

21. Simmons v. United States 390 U.S. 377 (1968)
CONT. BACK side OUT OF PAPER

The court would have determined that rules apply. After witness says
he told Bibbs to get back on the bus and proceed with his route.
when I tell informant officials about this part in this conspiracy they say
they have nothing to do w/ Rock Region. Sounds like the informant is no
See Police Report 3-2-19

CATA
THANK YOU!

DAY PASS

\$ 3.75

BUS 1007:

1-82736

ISSUED:

MAR 02

01:00

EXPIRES:

SAT

02

MAR

19

at

11

:59

AM

No. 01031812

D11145-040211

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